

# EXHIBIT 30

BILL DONNER  
11/16/2021

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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HUNTERS CAPITAL, LLC, et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 20-cv-00983-TSZ
	)	
CITY OF SEATTLE,	)	
	)	
Defendant.	)	

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ZOOM 30(b)6 Deposition Upon Oral Examination

Of

BILL DONNER - RICHMARK LABEL

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CONTAINS CONFIDENTIAL PORTIONS

DATE: Tuesday, November 16, 2021

REPORTED BY: Mindy L. Suurs, CSR No. 2195

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1           A.    I do believe I remember at least once when  
2   some -- Department of Transportation truck came in to haul  
3   away some garbage, but I can't tell you how many times,  
4   what time of day or anything. That seems to be a  
5   recollection I have.

6   BY MR. CRAMER:

7           Q.    And did anyone from the City ever talk to you  
8   about how trucks -- the plan for the roads would make it  
9   possible for trucks coming to Richmark to go north on 11th?

10           MR. WEAVER: Objection.

11           A.    No.

12   BY MR. CRAMER:

13           Q.    So how did trucks access Richmark during that  
14   time period?

15           A.    Most would come south on 12th Avenue, take a  
16   right on Olive, the north corner of our block, a left onto  
17   11th, and some also got in from -- on John Street, which is  
18   a couple blocks further north at the north end of the  
19   park -- no, beyond the north end of the park -- some would  
20   come down that for a while. I could come down that. I  
21   normally would come Pine to come to work, but I switched  
22   over to John and could come straight down 11th.

23                   So some trucks came down 11th all the way from  
24   John, some went 12th, but they all entered going south on  
25   11th from Olive, the north corner of the building -- of the

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1 block, rather.

2 Q. And I think you said earlier that there were a  
3 few occasions where trucks couldn't get there, but  
4 generally, trucks were able to access Richmark Label during  
5 the entire time period; right?

6 MR. WEAVER: Objection.

7 A. Most of the time, yes.

8 BY MR. CRAMER:

9 Q. And were they able to utilize the parking lot on  
10 11th? Is that where trucks come in and out of?

11 A. At 11th -- you saw the picture of the loading  
12 dock. Okay? From that picture to the left is where our  
13 employees parked. They come in the driveway to the loading  
14 dock. There were a couple of times -- the trucks would, as  
15 I say, come south on 11th and they'd have to go just  
16 slightly past the loading dock to back in. These were  
17 fairly substantial trucks.

18 There were some occasions -- I don't remember the  
19 number -- where protesters had to help move makeshift  
20 barricades so that the trucks coming south could go far  
21 enough south to back up, and then it was also awkward for  
22 them because sometimes they would have protesters parking  
23 right across the street, which made it really difficult for  
24 trucks to then get back out again and make the turn. It  
25 always ended up happening that trucks got out, but

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1 sometimes it took them a long time, sometimes we had to  
2 find people to move a car that didn't belong there -- it  
3 was in a no parking area. So we made it. We survived. It  
4 was extremely difficult. Some days were worse than other  
5 days.

6 Q. What was your sense of what access was like  
7 further away from the park?

8 MR. WEAVER: Objection.

9 A. I don't know.

10 BY MR. CRAMER:

11 Q. What was access like on 12th, where the liquor  
12 store and the parking garage are?

13 A. I don't remember the day, but at some point --  
14 again, the north end was Olive -- okay? -- that the police  
15 blocked off 12th Avenue between Olive and Pine so that,  
16 where the liquor store was, that cars could come in and  
17 park in their lot, they could not anymore. Okay. Our  
18 employees couldn't park up there, so we stacked them on  
19 11th -- we made as much room anywhere we could because they  
20 could get to work; we just had to find spots for them.

21 Q. And you said that that was at some point during  
22 the month of June that you think the police blocked off  
23 that --

24 A. Blocked off -- yeah, 12th Avenue.

25 Q. And is it your understanding that that

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1 in, "Bill, have you seen what's going on out there?"

2 Because there are no windows. Okay?

3 So walked out the door that's next to the  
4 overhead doors that you saw for the shipping and receiving  
5 for the loading dock, went to 11th Avenue, the street, and  
6 saw a whole lot of people. It looked like armored  
7 personnel carriers and guns on the corner. And we went  
8 right back in. And we're standing and they're walking and  
9 we're walking, and some of them were kind of close to us,  
10 and we walked back in the building and closed the doors.

11 We got calls -- some employees that were on their  
12 way said, "Hey, what's going on? We can't get there." I  
13 say, Go home if you want, wait, we don't know.

14 We had a couple salespeople that parked several  
15 blocks away and waited because I -- I'm trying to remember,  
16 but I think by around 11:00, everybody could get in the  
17 building and everybody went back to work. They weren't  
18 afraid anymore. I mean the park -- they did a great job.  
19 They cleared the park and the playfield fairly quickly.  
20 First the police came in, as I said before, moved people  
21 out; then the trucks came and -- to clean up all the  
22 garbage. And they didn't prohibit us from getting into our  
23 building.

24 Q. And you could leave as well? I mean it was -- at  
25 that point you had full unfettered access to the building?

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1           A.    I do not remember -- as far as I know, yes. I  
2    don't remember any trucks not getting in. Some  
3    employees -- you know, they heard about it, they stayed  
4    home. We told anybody that hey, you don't feel good about  
5    coming, don't come in. Those of us that were there  
6    working, we worked. I mean nobody stormed the building in  
7    the month of June.

8           Q.    Other than the -- going back to the damages  
9    estimate, does -- Exhibit 92 -- does that fully capture the  
10   damages that you are claiming in this lawsuit?

11          A.    I'm a little rattled. I'm a little rattled at  
12   the moment. Between the two, I'm not nearly as confident  
13   as I -- I mean I -- everybody was told Barry is a CFO, he's  
14   a bean counter, pardon the expression. He's good. He  
15   doesn't cheat anybody. He's honest as the day.

16                Whether he made a mistake or tripped himself up  
17   now, I -- you know, I'll fall on my sword for you. Okay?  
18   But I don't know of anything else. We told him keep track  
19   of everything, don't embellish on -- be conservative, I  
20   don't want to be in a position of asking for something that  
21   we don't have coming.

22                Now, did we misquote -- you know, misitemize some  
23   things -- like Northwest Liquor, I used the wrong words,  
24   versus, you know, collected the money back from that.  
25   That's just an honest mistake.

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REPORTER'S CERTIFICATE

I, Mindy L. Suurs, the undersigned Certified Court Reporter, pursuant to RCW 5.28.010, authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify:

That the foregoing testimony of BILL DONNER was given before me at the time and place stated therein and thereafter was transcribed under my direction;

That the sworn testimony and/or proceedings were by me stenographically recorded and transcribed under my supervision, to the best of my ability;

That the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or proceedings given and occurring at the time and place stated in the transcript;

That the witness, before examination, was by me duly sworn to testify the truth, the whole truth, and nothing but the truth;

That I am not a relative, employee, attorney, or counsel of any party to this action or relative or employee of any such attorney or counsel and that I am not financially interested in the said action or the outcome thereof;

DATE: November 23, 2021

*Mindy L. Suurs*

Mindy L. Suurs  
Certified Court Reporter #2195

